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Self-Insurers' Security Fund

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SELF-INSURERS' SECURITY FUND, a
California Non-Profit Mutual Benefit
Corporation,

Plaintiff,

v.

GALLAGHER BASSETT SERVICES,
INC., a Delaware Corporation,

Defendant.

Case No. C 06-02828 JSW (JCS)

Complaint Filed: March 27, 2006
Trial Date: October 22, 2007

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINES FOR
EXPERT DISCOVERY**

STIPULATION

WHEREAS, by Civil Minute Order dated June 6, 2007, the Honorable Magistrate Judge Joseph C. Spero ordered defendant Gallagher Bassett Services, Inc. ("Gallagher Bassett") to provide access to its electronic "RisxFacs" database to consultants retained by plaintiff Self-Insurers' Security Fund (the "Fund") by no later than 5:00 p.m. on Friday, June 8, 2007;

WHEREAS, there currently exists outstanding additional discovery materials to be produced for review by the Fund's consultants, including hard copy claim files and/or imaged documents for approximately 30 of 576 claimants that were requested by the Fund and are needed for review by the Fund's retained consultants;

The parties, through their counsel, hereby stipulate as follows:

1. The deadline for exchanging expert reports regarding the Fund's claim under Section 17200 of the California Business & Professions Code is hereby extended by two weeks, from June 14, 2007, to June 28, 2007. The deadline for completion of expert discovery is similarly extended by two weeks, from July 20, 2007, to August 3, 2007.

2. Extending the expert discovery deadlines as set forth above will not impact the other deadlines in the case. The schedule will be as follows:

Old Date	New Date	Event
June 14	June 28	Exchange expert reports on 17200 claim
July 20	August 3	Last day Expert discovery
August 24	no change	Last day for S/J Hearing
October 1	no change	Pretrial Conference
October 22	no change	Trial

3. This is the first modification to the case management schedule requested by the parties.

Dated: June 8, 2007

FOLGER LEVIN & KAHN LLP

/s/

Jiyun Cameron Lee
Attorneys for Plaintiff
Self-Insurers' Security Fund

Dated: June 8, 2007

BINGHAM MCCUTCHEN LLP

/s/

Robert A. Lewis
Attorneys for Defendant
Gallagher Bassett Services, Inc.

ORDER

Pursuant to stipulation, it is so ordered.

Dated: June ¹¹_____, 2007


The Honorable Jeffrey S. White

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